
Exhibit 7

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

AHARON MILLER, et al.,	:	
Plaintiffs,	:	
	:	Case No. 18-cv-2192 (BMC)(PK)
-against-	:	
	:	
ARAB BANK, PLC,	:	
Defendant.	:	
NATHAN PAM, et al.,	:	
Plaintiffs,	:	Case No. 18-cv-4670 (BMC)(PK)
	:	
-against-	:	
	:	
ARAB BANK, PLC,	:	
Defendant.	:	

**DEFENDANT ARAB BANK, PLC’S RESPONSES AND OBJECTIONS TO
PLAINTIFFS’ SECOND REQUEST FOR THE PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Arab Bank, plc (“Arab Bank”), by its undersigned counsel, hereby responds and objects to Plaintiffs’ Second Request for the Production of Documents dated July 22, 2019 (the “Requests”) as follows:

OBJECTIONS APPLICABLE TO MOST REQUESTS¹

1. Arab Bank objects to the Requests to the extent that they seek the production of documents that do not specifically relate to the allegations in the “Complaints” (as defined in the Requests). The Requests seek documents related to bank accounts and transactions for 396 individuals and entities, only 80 of which are mentioned in the Complaints. Of those 80 individuals and entities, only 7 are alleged to have committed, planned, or authorized any of the 14 attacks that Plaintiffs claim caused their alleged injuries (the “Incidents”). Thus Arab Bank objects to these Requests on the grounds that they are overly broad, outside the scope of the Complaints’

¹ Because these objections apply to multiple Requests, for the sake of brevity, they are stated in full only at the outset; as applicable, they are also referenced in the responses to each separate Request.

allegations against Arab Bank, unduly burdensome, disproportionate to the needs of the case,² and request the production of documents that are not relevant to the claims or defenses of any party.

2. Arab Bank objects to these Requests to the extent they seek disclosure of documents that are subject to bank confidentiality laws of the countries in which Arab Bank operates. The Requests seek the production of documents located outside of the United States regarding financial services rendered outside of the United States, particularly in Jordan, Lebanon, and the Palestinian Territories. As Arab Bank noted in its Answers, Arab Bank is constrained from responding to such requests by the bank confidentiality laws of those jurisdictions. (*See Miller v. Arab Bank, PLC*, 18-cv-2192 (BMC)(PK) (Dkt. 39 at 1-2); *Pam v. Arab Bank, PLC*, 18-cv-4670 (BMC)(PK) (Dkt. 32 at 1-2; Dkt. 33 at 1-2)). Violating those laws would expose Arab Bank to criminal sanctions and fines and would undermine the legally protected privacy rights of foreign persons who are not parties to these actions.³ As Plaintiffs and the Court are aware, Arab Bank cannot produce banking records without the account holders' permission or regulatory approval. The Requests call for banking records for hundreds of accounts, most of which are for people or entities with no connection to the Incidents. It will be difficult, if not impossible, for Arab Bank to obtain customer consent or regulatory approval for all of the records Plaintiffs have requested. Arab Bank respectfully objects on the grounds that these Requests are impermissibly broad, unduly burdensome, and disproportionate to the needs of the cases. Fed. R. Civ. P. 26(b)(1).

² Throughout these Responses, an objection that a Request is "disproportionate" means that it is disproportionate to the needs of the cases based on the factors set forth in Rule 26(b)(1) of the Federal Rules of Civil Procedure.

³ *See* Br. for the United States as Amicus Curiae, *Arab Bank, PLC v. Linde, et al.*, No. 12-1485, 2014 WL 2191224, at *16-17 (S. Ct. May 23, 2014) (noting that "criminal statutes governing bank secrecy in a number of foreign jurisdictions prohibit disclosing the [foreign financial information] sought by" plaintiffs and further noting that these statutes "reflect legitimate sovereign interests in protecting foreign citizens' privacy and confidence in the nations' financial institutions").

To make this process more practicable, Arab Bank suggests that Plaintiffs make a good faith effort to narrow these Requests to be proportional to the allegations in these cases. Attempting to request foreign regulators to waive bank confidentiality laws for the accounts of hundreds of customers who are not identified in the Complaints—and thus have no connection to the Incidents—severely jeopardizes the success of any waiver request. Once the Court rules on the appropriate scope of the Requests, Arab Bank is prepared to work with Plaintiffs and the Court to pursue all lawful means to obtain relevant banking records that are proportional to these cases, including seeking customer consent and regulatory approval. Arab Bank also will work with Plaintiffs’ counsel and the Court to prepare appropriate Letters Rogatory under the Hague Convention and similar laws to obtain foreign court approval for the production of relevant and proportional banking records. Arab Bank previously produced in *Linde v. Arab Bank, PLC*, No. 04-cv-02799 (E.D.N.Y.) (the “*Linde* case”) foreign bank account records after affirmatively obtaining the consent of the Saudi Committee in Support of the Palestinian People (the “Saudi Committee”) and the Lebanese Special Investigation Commission (the “LSIC”). As detailed below, Arab Bank is producing certain of those documents in these cases.

3. Arab Bank objects to the Requests to the extent they seek the production of documents or information protected by privileges, including but not limited to the attorney-client privilege, the attorney work product doctrine, and any other legally recognized obligation and/or rule. Arab Bank hereby claims such privileges and objects to the production of any documents subject thereto. Arab Bank will produce an appropriate privilege log that complies with E.D.N.Y.-S.D.N.Y. Local Civil Rule 26.2.

4. Arab Bank objects to the definitions of “Arab Bank” and “You” to the extent they go beyond the named Defendant, Arab Bank, plc.

5. Arab Bank objects to the characterization of certain individuals and entities, including the vagueness of the terms used to describe them, referred to in the Requests as “Suicide Bombers,” “Martyrs,” terrorists, leaders, operatives, agents, zakat committees, charitable societies, and/or social institutions affiliated with the following entities: PIJ, PFLP, PLO, PA, Fatah, and/or AAMB.

RESPONSES AND OBJECTIONS TO SPECIFIC DOCUMENT REQUESTS⁴

The following Responses and Objections to specific Requests are made in addition to and without waiving the foregoing Objections Applicable to Most Requests (the “Initial Objections”), which are expressly incorporated into the responses and objections set forth below.

DOCUMENTS CONCERNING PALESTINIAN ISLAMIC JIHAD (“PIJ”)

REQUEST NO 1.

All Documents concerning accounts maintained at Arab Bank by the following PIJ leaders and operatives:

- a. Bisam Abd al-Rahman Ahmad Abu Akar; and
- b. Issa Muhammad Ismai’l al-Batat.

RESPONSE TO REQUEST NO 1:

Arab Bank objects to Request No. 1 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 2 alleged PIJ leaders and operatives for whom Plaintiffs are requesting information, only 1 is referenced in the Complaints, and neither is alleged to have committed, planned, or authorized

⁴ In responding to these Requests, Arab Bank is producing documents by identifying Bates numbers of documents previously produced in the *Linde* case (hereinafter referred to as “*Linde* Bates Nos.”) with the understanding that the parties will: (1) adhere to the prior confidentiality designations for those documents under the meanings set forth in the *Linde* Protective Order (see Dkt. 85); and (2) otherwise maintain documents pursuant to the terms set forth in the Protective Order entered by this Court in *Pam* (see Dkt. 43) and *Miller* (see Dkt. 50). To the extent that this is contradictory to the Instructions for these Requests, including Instruction Nos. 3, 5, 7, 8, and 13, Arab Bank objects to those instructions as overly burdensome.

any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 1 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to the individual identified in the Complaints.

REQUEST NO 2:

All Documents concerning accounts at Arab Bank or funds transfers by Arab Bank involving the following PIJ leaders, operatives and agents:

- a. Ziyad al-Nakhala;
- b. Sheikh Ramadan Abdalla Shalah;
- c. Sheikh Abd al-Aziz Awda;
- d. Fathi Shiqaqi;
- e. Sami al-Arian;
- f. Bashir Musa Muhammad Nafi;
- g. Muhammad Ayub Muhammad Sidr;
- h. Luay Jihad Fathallah al-Sa'di;
- i. Hanadi Taysir Abd al-Malek Jaradat;
- j. Muhammad Fares Bashir Jaradat;
- k. Khaled Hussein Jaradat;
- l. Muhammad Abd al-Aziz Ghanem;
- m. Mustafa Tawfiq Muhammad Awd;
- n. Muhammad Saleh Muhammad Sayfi;
- o. Shafiq Ali Suliman Radaida;
- p. Ataf Dawud Hasan Aliyan;
- q. Nihaya Khaled Mahmud al-Khatib;
- r. Tamer Khuweir;
- s. Ghasan al-Tirmasi;
- t. Muhammad Dahduh;
- u. Mahmud al-Majzub;
- v. Husam Jaradat;
- w. Ahmad Abd al-Rahman Abu Hasira;
- x. Mustafa Tawfiq Zaydan;
- y. Salah Abu Hasnin;
- z. Mahmud al-Hindi;
- aa. Muqlid Hamid;
- bb. Iyad Ahmad Yusuf Sawalha;

- cc. Muhammad Said al-Hindi;
- dd. Ali Suliman Said al-Sa'adi;
- ee. Ahmad al-Mudalal;
- ff. Anwar Mahmud Ahmad Hamran;
- gg. Muhammad Saqr Ragheb al-Zatme;
- hh. Murad Abd al-Fatah Abu al-Asal;
- ii. Nu'man Taher Sadeq Tahaina;
- jj. Bassam Sa'adi;
- kk. Sheikh Sharif Tahayna;
- ll. Usri Fayad;
- mm. Dhiyab Abd al-Rahim Abd al-Rahman al-Shweiki;
- nn. Akef Fayez Nazal;
- oo. Ali Suliman al-Safuri;
- pp. Iyad Ahmad Yusuf Sawalha;
- qq. Riyadh Muhammad Ali Badir;
- rr. Sameh Samir Muhammad Shubki;
- ss. Bahaa Abu Al Ata;
- tt. Tareq Qa'adan;
- uu. Shahdi Mhanna;
- vv. Ali Zafour;
- ww. Raed Jundiya;
- xx. Khaled al-Batsh; and
- yy. Nasser Ahmad Yussuf Shawkah.

RESPONSE TO REQUEST NO 2:

Arab Bank objects to Request No. 2 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 51 alleged PIJ leaders, operatives, and agents for whom Plaintiffs are requesting information, only 4 are referenced in the Complaints and only 2 are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 2 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank's knowledge because it calls for all documents concerning: (1) Arab Bank accounts "involving" the listed individuals without identifying the persons who allegedly opened or maintained the accounts; and (2) "funds transfers by Arab Bank involving" the listed individuals without identifying who initiated and/or received the funds transfers. Arab Bank further objects to Request No. 2 to the extent it seeks production of banking records located

in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to accounts opened or maintained at Arab Bank, or funds transfers initiated and/or received, by the individuals identified in the Complaints.

REQUEST NO 3:

All Documents concerning accounts maintained at Arab Bank by the following PIJ zakat committees, charitable societies and social institutions or transfers involving those committees, societies and institutions:

- a. Al-Ihsan Charitable Society in Bethlehem;
- b. Al-Ihsan Charitable Society in Gaza;
- c. Al-Ihsan Charitable Society in Jenin;
- d. Al-Ihsan Charitable Society in Tulkarem;
- e. Dar al-Huda Society;
- f. Al-Jama'a al-Islamiya a/k/a al-Rabita al-Islamiya;
- g. Banners of Charity a/k/a Bayareq al-Ataa Society;
- h. Islamic An-Naqqa Society for Women Bethlehem a/k/a Islamic Women Charitable Society for Purity; and
- i. Cultural Forum of Palestinian Islamic Jihad Women.

RESPONSE TO REQUEST NO 3:

Arab Bank objects to Request No. 3 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 9 organizations for which Plaintiffs are requesting information, only 8 are referenced in the Complaints, and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank also objects to Request No. 3 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank's knowledge because it calls for all documents concerning "transfers involving" the listed organizations without identifying the individuals who initiated and/or received the transfers. Arab

Bank further objects to Request No. 3 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to accounts opened or maintained at Arab Bank, or transfers initiated and/or received, by the organizations identified in the Complaints.

REQUEST NO 4:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the families of the following PIJ Suicide Bombers, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Faysal Mustafa Husein Abu Sariya (*see, e.g.*, ABPLC026392);
2. Family of Mustafa Faysal Mustafa Abu Sariya;
3. Hilwa Muhammad Abd al-Fatah Rashed (*see, e.g.*, ABPLC026327);
4. Family of Abd al-Fatah Muhammad Musleh Rashed;
5. Ibrahim Mustafa Muhammad Abu Shaduf (*see, e.g.*, ABPLC024038);
6. Family of Nidal Ibrahim Mustafa Abu Shaduf;
7. Muhammad Yusuf Nimer Abu Sayfin (*see, e.g.*, ABPLC026322);
8. Family of Nimer Muhammad Yusuf Abu Sayfin;
9. Ishaq Abdalla Ibrahim Nabtiti (*see, e.g.*, ABPLC030742);
10. Family of Akram Ishaq Abdalla al-Nabtiti;
11. Hilal 'Abd Al-Sattar Ali Sabah (*see, e.g.*, ABPLC023866);
12. Family of Alaa' Hilal Abd al-Satar Sabah;
13. Muhammad Ali Nayef Sawitat (*see, e.g.*, ABPLC030873);
14. Family of Yusuf Muhammad Ali Sawitat;
15. Taysir Shehada Rashid Jabali (*see, e.g.*, ABPLC026335);
16. Family of Nidal Taysir Shehada Jabali;
17. Fatima Isma'il Ahmad Sa'ad (*see, e.g.*, ABPLC030811);
18. Family of Dawud Ali Ahmad Sa'ad Abu Sawi;
19. Faraj al-Ara'ir (*see, e.g.*, ABPLC010575);
20. Family of Nabil Faraj al-Ara'ir;
21. Kawthar Hussein Khalil al-Shaweki (*see, e.g.*, ABPLC026278);
22. Family of Hatem Yaqin Ayesh Al-Sheweikeh;
23. Abd al-Mun'im Ahmad Midraj Daraghima (*see, e.g.*, ABPLC026268);

24. Family of Ahmad Abd al-Mun'im Daraghima;
25. Ghada Ibrahim Sa'id Ayesh (*see, e.g.*, ABPLC030778);
26. Family of Yusuf Muhammad Mahmud Ayesh;
27. Salim Najib Salim Abu Diyak (*see, e.g.*, ABPLC030840);
28. Family of Ra'fat Salim Abu Diyak;
29. Mahmud Baker Saleh Naser (*see, e.g.*, ABPLC023953);
30. Family of Muhammad Mahmud Baker Naser;
31. Jamil Husein Ya'cob Faraj (*see, e.g.*, ABPLC030738);
32. Family of Muhammad Jamil Hussein Faraj;
33. Malika Tawfiq al-Qader Tahayna (*see, e.g.*, ABPLC030823); and
34. Family of Abd al-Karim Issa Khalil Tahayna.

RESPONSE TO REQUEST NO 4:

Arab Bank objects to Request No. 4 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 34 alleged "PIJ Suicide Bombers" for whom Plaintiffs are requesting information, only 1 is referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 4 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 5:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of families of the following PIJ "Martyrs," including, but not limited to, transaction records, account statements, account opening documentation, communications

concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Abd al-Rahman As'ad Naser Daqa (*see, e.g.*, ABPLC030796);
2. Mahdiya Mahmud Abd al-Naser Daqa (*see, e.g.*, ABPLC019161, ABPLC12281);
3. Family of As'ad Abd al-Rahman As'ad Naser Daqa;
4. Hilwa Muhammad Abd al-Fatah Rashed (*see, e.g.*, ABPLC026327);
5. Family of Abd al-Fatah Muhammad Musleh Rashed;
6. Samah Jawdat Salim Abu al-Wafa (*see, e.g.*, ABPLC030976);
7. Family of Mahmud "Nursi" Tawalbeh;
8. Rasmi Sadeq Hamad Basharat (*see, e.g.*, ABPLC024039);
9. Family of Walid Rasmi Sadeq Basharat;
10. Muhammad Nayef Fayez Hardan (*see, e.g.*, ABPLC023856);
11. Family of Iyad Muhammad Nayef Hardan;
12. Mahmud 'Abd Al-Rehim Nimer (*see, e.g.*, ABPLC023855);
13. Family of Ashraf Mahmud abd al-Rahim Nimer Bardawil;
14. Abd al-Rahman Hasan abd al-Qader al-Muqid (*see, e.g.*, ABPLC026261);
15. Family of Mahmud abd al-Rahman al-Muqid;
16. Abd Muhammad Zbeidi (*see, e.g.*, ABPLC030904);
17. Family of Taha Muhammad Abd al-Rahman Zbeidi;
18. Ahmad Muhammad Suliman Abu Khader (*see, e.g.*, ABPLC026337);
19. Family of Muhammad Ahmad Abu Khader Basharat;
20. Suzan Midhat Fayez Abd al-Al (*see, e.g.*, ABPLC021691);
21. Family of Muhammad Atwa Abd al-Al;
22. Rana Ibrahim Ali Abu Musa (*see, e.g.*, ABPLC026417);
23. Family of Munir Mustafa Ibrahim Abu Mussa;
24. Kifaya Ahmad Sadiq Asaf (*see, e.g.*, ABPLC026396);
25. Family of Wa'el Mutlaq Muhammad Asaf;
26. Muhammad Hashem Khalil al-Natsha (*see, e.g.*, ABPLC030884);
27. Family of Nabil Muhammad Hashem al-Natsha;
28. Mahmud Abd Allah Hamad Makhluף (*see, e.g.*, ABPLC030882);
29. Family of Mutasem Mahmud Abdallah Makhluף;
30. Subhi Abd al-Karim Abd al-Fatah Balbisi (*see, e.g.*, ABPLC030735);
31. Family of Maher al-Balbisi;
32. Samiya Kamal Nazmi Abd al-Ghani (*see, e.g.*, ABPLC030645);
33. Family of Anwar Awni Abd al-Ghani;
34. Ahmad Tawfiq Muhammad Arida (*see, e.g.*, ABPLC030765); and
35. Family of Sufyan Arida.

RESPONSE TO REQUEST NO 5:

Arab Bank objects to Request No. 5 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 35 alleged "PIJ Martyrs" for whom Plaintiffs are requesting information, none are referenced

in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 5 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 6:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the families of the following PIJ terrorists who were incarcerated in Israeli prisons, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or proof of incarceration for the individuals that qualified the account holder or payee to receive payment:

1. Raqiya Muhammad Hasan Basharat (*see, e.g.*, ABPLC019165);
2. Najwi Hamdan Bakir Abu Hasira;
3. Ikhlas Abd al-Rahim Abd al-Rahman al-Shuweiki (*see, e.g.*, ABPLC019107);
4. Mahmud Qasem Arafat al-Razem (*see, e.g.*, ABPLC012253);
5. Hanu Adel Ibrahim Jaradat (*see, e.g.*, ABPLC19176);
6. Hilwa Suliman Saleh al-Batat (*see, e.g.*, ABPLC019220);
7. Badriya Muhammad Nimer Mardawi (*see, e.g.*, ABPLC018971);
8. Muna Abd Rabo Muhammad Abu al-Jadyan (*see, e.g.*, ABPLC011055);
9. Abd al-Ra'uf Taher Tahaina (*see, e.g.*, ABPLC019260);
10. Jamila Safi Muhammad Safi (*see, e.g.*, ABPLC019018);
11. al-Maza Ramadan Mahmud al-Husni (*see, e.g.*, ABPLC011343);
12. Ayub Muhammad Dawud Sidr (*see, e.g.*, ABPLC012667);
13. Nasrin Salem Mahmud Jaradat (*see, e.g.*, ABPLC019075);
14. Subhi Muhammad Abd el-Ghani Abu Tabikh (*see, e.g.*, ABPLC012279);
15. Ya'qub Muhammad Abu Rumi (*see, e.g.*, ABPLC012680);

16. Amina Amani Mutlaq Asaf (*see, e.g.*, ABPLC019149);
17. Ibrahim Awd Allah Ahmad al-Hih (*see, e.g.*, ABPLC018953); and
18. Malkiya Tawfiq Muhammad Arida (*see, e.g.*, ABPLC019014).

RESPONSE TO REQUEST NO 6:

Arab Bank objects to Request No. 6 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 18 alleged “PIJ terrorists” for whom Plaintiffs are requesting information, only 2 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 6 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee’s consent.

REQUEST NO 7:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the following PIJ operatives, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to the PIJ operatives, and death certificates, photographic identification, certificates of martyrdom and/or proof of incarceration for the individuals that qualified PIJ operatives to receive payment:

1. Amar Ahed Wadi’ al-Shubki (*see, e.g.*, ABPLC016945);
2. Hazem Yaser Irhim (*see, e.g.*, ABPLC013018);
3. Jamal Hasan Muhammad Suman (*see, e.g.*, ABPLC018961);
4. Khaled al-Zaq (*see, e.g.*, ABPLC013031);

5. Mahmud abd al-Rahman al-Muqid (*see, e.g.*, ABPLC013472);
6. Abd al-Rahman Hasan Abd al-Qader al-Muqid (*see, e.g.*, ABPLC026261);
7. Muhammad Abd al-Aziz al-Batran (*see, e.g.*, ABPLC019209);
8. Muhammad Khalil Abd al-Latif al-Sheikh Khalil (*see, e.g.*, ABPLC023849);
9. Fahed Abdallah Muhammad Sawalha (*see, e.g.*, ABPLC017138); and
10. Khaled Khalil Hamed (*see, e.g.*, ABPLC018460).

RESPONSE TO REQUEST NO 7:

Arab Bank objects to Request No. 7 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 10 alleged “PIJ operatives” for whom Plaintiffs are requesting information, none are referenced in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 7 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee’s consent.

DOCUMENTS CONCERNING POPULAR FRONT FOR THE LIBERATION OF PALESTINE (“PFLP”)

REQUEST NO 8:

All Documents concerning accounts maintained at Arab Bank by the following PFLP leaders, operatives and agents:

- a. Khader Taleb Khader Dhiyab.

RESPONSE TO REQUEST NO 8:

Arab Bank objects to Request No. 8 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, the listed individual is not referenced in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 8 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2.

REQUEST NO 9:

All Documents concerning accounts at Arab Bank or funds transfers by Arab Bank involving the following PFLP leaders and operatives:

- a. George Habash;
- b. Mustafa al-Zibri AKA Abu Ali Mustafa;
- c. Ahmad Sa'adat a/k/a Ahmad Sa'dat Abd al-Rasul;
- d. Abd al-Rahim Maluh;
- e. Maryam Abu Diqa;
- f. Muhammad Shauqi Sa'id Nazal;
- g. Nureddin Adnan Sa'id Daoud;
- h. Jamal Hindi Zayed;
- i. Jamil Mizher;
- j. Ra'fat Ali Muhammad al-Aruqi;
- k. Shafer Ali Mahmoud al-Rai;
- l. Maher Ali Mahmoud al-Rai;
- m. Ali Atiya Jaradat;
- n. Amer Muhammad Musa Jafal;
- o. Ahmad Abu al-Sa'ud Abd al-Razaq Hanani;
- p. Yaman Tayeb Ali Faraj;
- q. Ra'ed Musa Ibrahim Nazal;
- r. Adnan Muhammad Ata Maragha;
- s. Othman Muhammad Ata Maragha;
- t. Handuma Rashed Ibrahim Wishah;
- u. Kamil Sa'id Abu Hanish;
- v. Basel Asmar;
- w. Ahed Abu Ghalma; and
- x. Ayman al-Hur.

RESPONSE TO REQUEST NO 9:

Arab Bank objects to Request No. 9 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 24 alleged PFLP leaders and operatives for whom Plaintiffs are requesting information, only 3 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 9 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank's knowledge because it calls for all documents concerning: (1) Arab Bank accounts "involving" the listed individuals without identifying the persons who allegedly opened or maintained the accounts; and (2) "funds transfers by Arab Bank involving" the listed individuals without identifying who initiated and/or received the funds transfers. Arab Bank further objects to Request No. 9 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to accounts opened or maintained at Arab Bank, or funds transfers initiated and/or received, by the individuals identified in the Complaints.

REQUEST NO 10:

All Documents concerning accounts maintained at Arab Bank by the following PFLP social institutions or transfers involving those institutions:

- a. Al-Karmel Cultural and Social Development Association;
- b. Health Work Committees a/k/a Union of Health Work Committees;
- c. Union of Agricultural Work Committees;
- d. Progressive Labor Front; and
- e. Union of Palestinian Women's Committees.

RESPONSE TO REQUEST NO 10:

Arab Bank objects to Request No. 10 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 5 alleged PFLP social institutions for which Plaintiffs are requesting information, only 1 is referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank also objects to Request No. 10 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank's knowledge because it calls for all documents concerning "transfers involving" the listed organizations without identifying who initiated and/or received the funds transfers. Arab Bank further objects to Request No. 10 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to accounts opened or maintained at Arab Bank, or transfers initiated and/or received, by the organization identified in the Complaints.

REQUEST NO 11:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the families of the following PFLP Suicide Bombers, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Muhammad Sidqi Hasan Nasar (*see, e.g.*, ABPLC030853);
2. Family of Shadi Muhammad Sidqi Nasar;
3. Khader Muhammad Abu Sariya (*see, e.g.*, ABPLC028693);
4. Family of Fu'ad Khader Abu Sariya;
5. Yusuf Muhammad Salameh al-Sa'idani (*see, e.g.*, ABPLC030608);

6. Family of Isma'il Yusuf al-Sa'idani;
7. Ahed Mahmud Abdalla Abd el-Hafez (*see, e.g.*, ABPLC030698); and
8. Family of Sadeq Ahed Abd el-Hafez.

RESPONSE TO REQUEST NO 11:

Arab Bank objects to Request No. 11 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 8 alleged “PFLP Suicide Bombers” for whom Plaintiffs are requesting information, only 2 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 11 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee’s consent.

REQUEST NO 12:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of families of the following PFLP “Martyrs,” including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Ahlam Nayef Al-Jalad (*see, e.g.*, ABPLC03065);
2. Family of Ayman Muhammad Fayeel Jalad;
3. Family of the Martyr Ali Sayel Muhammad Swidan (*see, e.g.*, ABPLC01167);
4. Muhammad Mahmud ‘Abd Al-Qader Harb (*see, e.g.*, ABPLC030836);

5. Family of Khalil Muhammad Mahmud al-Harb;
6. Abd Al-Magid Najib Naji Daghlis (*see, e.g.*, ABPLC026318);
7. Family of Mutaz Abd al-Majid Najib Daghlis;
8. Mahmud Dhib As'ad Subh (*see, e.g.*, ABPLC026357); and
9. Family of Umar Mahmud Dhib Subh.

RESPONSE TO REQUEST NO 12:

Arab Bank objects to Request No. 12 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 9 alleged “PIJ Martyrs” for whom Plaintiffs are requesting information, none are referenced in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 12 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee’s consent.

REQUEST NO 13:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the families of the following PFLP terrorists who were incarcerated in Israeli prisons, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or proof of incarceration for the individuals that qualified the account holder or payee to receive payment:

1. Farida Ali Daqa (*see, e.g.*, ABPLC011745);

2. Watfa Abd al-Fatah Muhammad Hanani (*see, e.g.*, ABPLC011796);
3. Watfa Ata Jaradat (*see, e.g.*, ABPLC019217);
4. Muhammad Musa Mahmud Jafal (*see, e.g.*, ABPLC012325);
5. Jamila Ibrahim Zayed (*see, e.g.*, ABPLC012033);
6. Zakiya Abd al-Rahman Tarkhan (*see, e.g.*, ABPLC011084);
7. Manahel Ali Ibrahim Shuqayrat (*see, e.g.*, ABPLC012318);
8. Awad Yusuf Mustafa Awad (*see, e.g.*, ABPLC011098);
9. Hanan Yusuf Musa Abu Ghalmi (*see, e.g.*, ABPLC019024);
10. Yusra Farid Rashid Mahrum (*see, e.g.*, ABPLC012294);
11. Umar Muhammad Nimer Abu Rashed (*see, e.g.*, ABPLC019659);
12. Hikmat Mustafa Hasan al-Aruqi (*see, e.g.*, ABPLC011332); and
13. Sabiha Umar Yusuf al-Far (*see, e.g.*, ABPLC011130).

RESPONSE TO REQUEST NO 13:

Arab Bank objects to Request No. 13 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 13 alleged “PFLP terrorists” for whom Plaintiffs are requesting information, none are referenced in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 13 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee’s consent.

REQUEST NO 14:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the following PFLP operatives, including, but not limited to,

transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to the PFLP operatives, and death certificates, photographic identification, certificates of martyrdom and/or proof of incarceration for the individuals that qualified PFLP operatives to receive payment:

1. Abd al-Rahman Nayef Yusuf al-Salibi (*see, e.g.*, ABPLC019465);
2. Ali Muhammad Abd al-Hadi Sayam (*see, e.g.*, ABPLC019553);
3. Ali Saleh Ibrahim Darwish (*see, e.g.*, ABPLC019481);
4. Dhib Uthman Ali al-Najar (*see, e.g.*, ABPLC019394);
5. Fawzi Talab Nasar al-Wahidi (*see, e.g.*, ABPLC019582);
6. Hasan Mahmud Hasan Labad (*see, e.g.*, ABPLC019373);
7. Khaled Abd al-Rahman Muhammad Matar (*see, e.g.*, ABPLC019456);
8. Imad Saleh Husein Abu Haya (*see, e.g.*, ABPLC019556);
9. Isa Mahmud Jaber al-Ghul (*see, e.g.*, ABPLC019535);
10. Salah Abd Rabo Muhammad Abu al-Jadyan (*see, e.g.*, ABPLC19458);
11. Nidal Muhammad Awda Salameh (*see, e.g.*, ABPLC019649);
12. Ramadan Atiya Ibrhaim Abu Qamar (*see, e.g.*, ABPLC019372);
13. Rashid Muhammad Rashid al-Sidawi (*see, e.g.*, ABPLC019371);
14. Rashid Saleh Muhammad al-Mabhuh (*see, e.g.*, ABPLC019370);
15. Riyadh Saleh Jaber al-Ghul (*see, e.g.*, ABPLC019376);
16. Muhammad Ibrahim Rajab Jarwan (*see, e.g.*, ABPLC019600); and
17. Muhammad Ma'ali Ubayd Abu Samra (*see, e.g.*, ABPLC019568).

RESPONSE TO REQUEST NO 14:

Arab Bank objects to Request No. 14 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 17 alleged “PFLP operatives” for whom Plaintiffs are requesting information, only 14 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 14 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde Bates* Nos. set

forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

**DOCUMENTS CONCERNING PALESTINE LIBERATION ORGANIZATION ("PLO")/
PALESTINIAN AUTHORITY ("PA") / FATAH / AL AQSA MARTYRS BRIGADE
("AAMB")**

REQUEST NO 15:

All Documents concerning accounts maintained at Arab Bank by the following Fatah/AAMB leaders, operatives and agents:

- a. Yasser Arafat;
- b. Marwan Barghuti;
- c. Muhammad Dahlan
- d. Nayef Abu-Sharakh; and
- e. Bilal Abu Amsha.

RESPONSE TO REQUEST NO 15:

Arab Bank objects to Request No. 15 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 5 alleged "Fatah/AAMB leaders, operatives and agents" for whom Plaintiffs are requesting information, only 2 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 15 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will continue to conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to the individuals identified in the Complaints.

REQUEST NO 16:

All Documents concerning accounts at Arab Bank or funds transfers by Arab Bank involving the following Fatah/AAMB leaders and operatives:

- a. Faruq Qadumi;
- b. Mahmud Abu Hamam;
- c. Maslama Thabet;
- d. Khaled Abu Hilal;
- e. Osama Khaled al-Silawi;
- f. Naser Badawi;
- g. Naser Naji Abu Hamid;
- h. Fadi Qafisha;
- i. Sirhan;
- j. Zakaria Zbeidi;
- k. Ahmad Yusuf Maghrabi;
- l. Mahmud Ahmad Muhammad Shawer;
- m. Marwan Kaid Mutliq abd al-Karim Zalum;
- n. Family of Muhammad Mashhur Muhammad Hashaikeh;
- o. Qahira Said Ali Sa'adi;
- p. Sanaa' Shahada;
- q. Abd al-Karim Rateb Yunes Aweis;
- r. Naser Jamal Musa Shawish;
- s. Mohammed Qasem Ahmed Aradah;
- t. Mohammed Said Ali Kablawi;
- u. Khad'er Amin Mohammed Dabiyah;
- v. Atef Abayat;
- w. Ahmad Taleb Mustafa Barghuthi al-Faransi;
- x. Majed Qini;
- y. Munzar Mahmoud Khalil Noor;
- z. Tawfiq Tirawi;
- aa. Amjad Mahmud Ibrahim Fakhuri;
- bb. Muhammad Hijazi;
- cc. Alaa Tafesh;
- dd. Haytham Abu al-Naja;
- ee. Zaher Abu Harbid;
- ff. Nasser al-Din Abu Harbid;
- gg. Ahmad Hilis;
- hh. Hassan 'Atiya Hassan Madhoun;
- ii. Na'el al-Sharif;
- jj. Jamil Khalaf Mustafa Hamid;
- kk. Riyadh Dakhallallah al-Amur;
- ll. Ibrahim Musa Salem Abayat;
- mm. Muhssien Attah;
- nn. Alaa 'Abd al-Kareen;
- oo. Muhammad Hamash;
- pp. Zaynab Ali Abu Salem a/k/a Zeinab Ali Issa Abu Salem;

- qq. Mohammed Muhtasib; and
- rr. Amnah Reehan.

RESPONSE TO REQUEST NO 16:

Arab Bank objects to Request No. 16 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 44 alleged Fatah/AAMB leaders and operatives for whom Plaintiffs are requesting information, only 3 are referenced in the Complaints and are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 16 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank's knowledge because it calls for all documents concerning: (1) Arab Bank accounts "involving" the listed individuals without identifying the persons who allegedly opened or maintained the accounts; and (2) "funds transfers by Arab Bank involving" the listed individuals without identifying who initiated and/or received the funds transfers. Arab Bank further objects to Request No. 16 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to accounts opened or maintained at Arab Bank, or funds transfers initiated and/or received, by the individuals identified in the Complaints.

REQUEST NO 17:

All Documents concerning accounts maintained at Arab Bank by the following PLO/PA/Fatah social institutions or transfers involving those institutions:

- a. Palestine National Fund
- b. Fatah Central Committee;
- c. Fatah Youth Movement;

- d. General Union of Palestinian Students;
- e. Civil Society Organizations Commission;
- f. Fatah Revolutionary Council;
- g. Fatah Mobilization and Organization Commission;
- h. Martyr Institute;
- i. Development Charitable Society;
- j. Give Gaza Society;
- k. Vanguard of the Popular Army a/k/a Tala'i al-Jaysh al-Sha'bi;
- l. Al-Qawasmeh Neighbourhood Charity a/k/a Charitable Al-Qawasmeh Neighborhood Society;
- m. Birzeit University Fatah Youth Movement;
- n. Palestinian Authority Ministry of Detainees and ex-Detainees;
- o. Palestinian Authority Economic Affairs Department; and
- p. Palestinian Authority Institute for the Care of Martyrs' Families and the Injured.

RESPONSE TO REQUEST NO 17:

Arab Bank objects to Request No. 17 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 16 alleged PLO/PA/Fatah social institutions for which Plaintiffs are requesting information, none are referenced in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank also objects to Request No. 17 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank's knowledge because it calls for all documents concerning "transfers involving" the listed organizations without identifying who initiated and/or received the transfers. Arab Bank further objects to Request No. 17 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2.

REQUEST NO 18:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the families of the following Fatah/AAMB Suicide Bombers, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by

Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Ahmad Abd al-Rahman Subh Daraghima (*see, e.g.*, ABPLC030781);
2. Family of Muhammad Ahmad Abd al-Rahman Daraghima Shu'ani;
3. Abd al-Qader Abd al-Jaber Abd al-Qader Khaled (*see, e.g.*, ABPLC030693);
4. Family of Abd al-Jaber Abd al-Qader Abd al-Jaber Khaled;
5. Wasfiya Mabruk Saleh Idris (*see, e.g.*, ABPLC030751);
6. Family of Wafa' Ali Khalil Idris;
7. Maysun Misbah Saleh Awda (*see, e.g.*, ABPLC030887);
8. Family of Yaser Sa'id Musa Awda;
9. Abd al-Fatah Hafez Sa'id Yasin (*see, e.g.*, ABPLC030874);
10. Family of Umar Abd al-Fatah Hafez Yasin;
11. Jihad Ibrahim al-Titi (*see, e.g.*, ABPLC016754);
12. Family of Jihad Ibrahim al-Titi;
13. Muhammad Mahmud Ahmad Hasuna (*see, e.g.*, ABPLC030601);
14. Family of Ibrahim Muhammad Mahmud Hasuna;
15. Ibrahim Sa'id Ibrahim Ramadan (*see, e.g.*, ABPLC030850);
16. Family of Sa'id Ibrahim Ramadan;
17. Wafaa' Ibrahim Abd al-Hafez Wahadna (*see, e.g.*, ABPLC024009);
18. Family of Ibrahim Muhammad al-Wahadna;
19. Taleb Salem Ali al-Dar'awi (*see, e.g.*, ABPLC023932);
20. Family of Salem Taleb Salem al-Dar'awi;
21. Sawsan Samih Fayez Hamad (*see, e.g.*, ABPLC026346); and
22. Family of Nazir Muhammad Mahmud Hamad.

RESPONSE TO REQUEST NO 18:

Arab Bank objects to Request No. 18 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 22 alleged "Fatah/AAMB Suicide Bombers" for whom Plaintiffs are requesting information, only 6 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 18 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat

of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 19:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of families of the following Fatah/AAMB "Martyrs," including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Family of the martyr Qusai Faysal Tawfiq Zahran (*see, e.g.*, ABPLC011683);
2. 'Aisha Nimer Ahmad Astiti (*see, e.g.*, ABPLC030949);
3. Family of Zuheir Muhammad Asad Astiti;
4. Wafaa Yusuf Dawud Amer (*see, e.g.*, ABPLC030950);
5. Family of Ziyad Ibrahim Ayd Amer;
6. Muhammad Jum'a Muhammad Abu Bakra (*see, e.g.*, ABPLC026406);
7. Family of Abd al-Rahman Muhammad Abu Bakra;
8. Imama Amin Suliman Istiti (*see, e.g.*, ABPLC026305);
9. Family of Ikrima Muhammad Khader Istiti;
10. Rania Mahmud Abd al-Mun'am al-Julani (*see, e.g.*, ABPLC025964);
11. Family of Ali Ibrahim Abd al-Rahman al-Julani;
12. Muhammad Hafez Qasem Sawafita (*see, e.g.*, ABPLC023918);
13. Family of Amin Muhammad Hafez Sawafita;
14. Izat Muhammad Sa'id Zakarna (*see, e.g.*, ABPLC030700);
15. Family of Dargham Izat Muhammad Zakarna;
16. Muhammad Hasan Dar Qadi (*see, e.g.*, ABPLC023927);
17. Family of Hasan Muhammad Hasan al-Qadi;
18. Abd al-Qader Abd al-Razeq (*see, e.g.*, ABPLC010761);
19. Family of Jamal Abd al-Qader Abd al-Razeq;
20. Mirfat Amin Muhammad Nawawira (*see, e.g.*, ABPLC030658);
21. Family of Jamal Ubayd Allah Nawawira Abayat;
22. Mahmud Othman Al-Alul (*see, e.g.*, ABPLC011608);
23. Family of Jihad Mahmud Othman al-Alul;
24. Jamal Taya Shahada Qabala (*see, e.g.*, ABPLC030807);
25. Family of Hukm Jamal Taya Qabala;
26. Hamdi Saleh Muhammad Awd (*see, e.g.*, ABPLC026195);
27. Family of Imad Hamdi Saleh Awd;

28. Umar Ali Hamad Jaser (*see, e.g.*, ABPLC026205);
29. Family of Mahmud Umar Ali Jaser;
30. Ata Fares Ataya Jaber (*see, e.g.*, ABPLC026233);
31. Family of Talat Ata Fares Jaber;
32. Amal Hussein Ali Aghbariya (*see, e.g.*, ABPLC030982);
33. Family of Nidal Muhammad Tawfiq Aghbariya;
34. Muhammad Tawfiq Mustafa Aghbariya (*see, e.g.*, ABPLC030952);
35. Amal Rasmi Abd Al-Khaleq Azam (*see, e.g.*, ABPLC023845);
36. Family of Ramadan Ismail Muhammad Azam;
37. Ahed Hasan Khalil Anbas (*see, e.g.*, ABPLC026317);
38. Family of Mustafa Ahed Hasan Anbas;
39. Ali Muhammad Mustafa al-Sus (*see, e.g.*, ABPLC030633);
40. Family of Muhammad Ali Muhammad al-Sus;
41. Ramadan Muhammad Ramadan al-Kafarna (*see, e.g.*, ABPLC026410);
42. Family of Muhammad Ramadan Muhammad al-Kafarna;
43. Juma Abd al-Rahim Muhammad Badawi (*see, e.g.*, ABPLC026349);
44. Family of Yaser Juma Abd al-Rahim Badawi;
45. Yasin Darwish al-Madhun (*see, e.g.*, ABPLC010629);
46. Family of Muhammad Yasin al-Madhun;
47. Ibrahim Khalaf Juma Bajali (*see, e.g.*, ABPLC030675);
48. Family of Ra'fat Ibrahim Khalaf Bajali;
49. Muna Ayesh Abd Abayat (*see, e.g.*, ABPLC190144);
50. Family of Husein Muhammad Salem Abayat;
51. Linda Ahmad Muhammad Shibani (*see, e.g.*, ABPLC030682); and
52. Family of Ra'ed Muhammad Sa'id al-Karmi.

RESPONSE TO REQUEST NO 19:

Arab Bank objects to Request No. 19 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 52 alleged “Fatah/AAMB Martyrs” for whom Plaintiffs are requesting information, only 17 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 19 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2.

Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 20:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the families of the following Fatah/AAMB terrorists who were incarcerated in Israeli prisons, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or proof of incarceration for the individuals that qualified the account holder or payee to receive payment:

1. Bahiya Hamad Nimer Jabara (*see, e.g.*, ABPLC012091);
2. Samira Suliman al-Barghuthi (*see, e.g.*, ABPLC01225);
3. Ahmad Ibrahim Musleh al-Satri (*see, e.g.*, ABPLC011053); and
4. Nur Nihad Khalil al-Kayal (*see, e.g.*, ABPLC011058).

RESPONSE TO REQUEST NO 20:

Arab Bank objects to Request No. 20 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 4 alleged "Fatah/AAMB terrorists" for whom Plaintiffs are requesting information, none are referenced in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 20 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set

forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 21:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the following Fatah/AAMB operatives, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to the Fatah/AAMB operatives, and death certificates, photographic identification, certificates of martyrdom and/or proof of incarceration for the individuals that qualified Fatah/AAMB operatives to receive payment:

1. Qusai Faysal Tawfiq Zahran (*see, e.g.*, ABPLC014784, ABPLC011683);
2. Rami Ismail Ali Alayan (*see, e.g.*, ABPLC013740);
3. Jamal Abd Rabo Muhammad Abu al-Jadyan (*see, e.g.*, ABPLC019353);
4. Ahmad Ata Yusuf Abu Saltah (*see, e.g.*, ABPLC016657);
5. Jihad Isma'il Ashur al-Amaryn (*see, e.g.*, ABPLC019421);
6. Sami Jawdat Barbakh (*see, e.g.*, ABPLC013158);
7. Murad Suliman Zuhdi Marshud (*see, e.g.*, ABPLC016908);
8. Tamer Rasem al-Rimawi (*see, e.g.*, ABPLC016023); and
9. Ahmad Tawfiq Barbakh (*see, e.g.*, ABPLC012930).

RESPONSE TO REQUEST NO 21:

Arab Bank objects to Request No. 21 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 9 alleged "Fatah/AAMB operatives" for whom Plaintiffs are requesting information, only 7 are referenced in the Complaints and only 1 is alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 21 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2.

Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 22:

All Documents concerning transactions processed by Arab Bank on behalf of the Al Ansar Society for the families of "Martyrs" and prisoners, including, but not limited to, transaction records, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification, certificates of martyrdom or proof of imprisonment for the individuals that qualified the account holder or payee to receive payment.

RESPONSE TO REQUEST NO 22:

Arab Bank objects to Request No. 22 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or disproportionate to the claims and defenses in these cases. In particular, the Request calls for all documents concerning "transactions processed by Arab Bank on behalf of the Al Ansar Society for the benefit of the families of 'Martyrs' and prisoners" without identifying: (1) the persons who allegedly transferred the funds on behalf of the Al Ansar Society; (2) the names of the alleged "Martyrs" and "prisoners"; or (3) the names of their family members. Additionally, the Request calls for all banking records for the purported recipients of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Moreover, the Complaints do not allege that the Al Ansar Society committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 22 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a

reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to individuals identified in the Complaints.

REQUEST NO 23:

All Documents concerning transactions processed by Arab Bank to or from the Palestinian Ministry of Social Welfare's Institute for the Care of Martyrs' Families and the Injured that concern "Martyrs" and prisoners.

RESPONSE TO REQUEST NO 23:

Arab Bank objects to Request No. 23 on the grounds that it is overly broad, unduly burdensome, and vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in this case. In particular, the Complaints do not reference the "Palestinian Ministry of Social Welfare's Institute for the Care of Martyrs' Families and the Injured," much less allege that it committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request fails to identify: (1) the individuals who initiated and/or received the transfers; or (2) the alleged "Martyrs and prisoners" purported to be associated with the transactions. Arab Bank further objects to Request No. 23 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2.

REQUEST NO 24:

All Documents concerning transactions processed by Arab Bank to or from the PLO.

RESPONSE TO REQUEST NO 24:

Arab Bank objects to Request No. 24 on the grounds that it is overly broad, unduly burdensome, and vague, and seeks the production of documents that are not relevant and/or are disproportionate to the claims and defenses in this case. In particular, the Request calls for all

banking records regarding PLO transactions, but the Complaints do not allege such records are related to any of the Incidents. Although the Complaints allege that a member of PLO was involved with one of the Incidents, they do not allege that the PLO committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 24 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to transactions to or from accounts in the name of the PLO.

REQUEST NO 25:

All Documents concerning transactions processed by Arab Bank to or from the Palestine National Fund.

RESPONSE TO REQUEST NO 25:

Arab Bank objects to Request No. 25 on the grounds that it is overly broad, unduly burdensome, and vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in this case. In particular, the Complaints do not reference the "Palestine National Fund," much less allege that it committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all documents concerning transactions "to or from the Palestine National Fund" without identifying the individuals who initiated and/or received the transactions. Arab Bank further objects to Request No. 25 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from

disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2.

REQUEST NO 26:

All Documents concerning accounts maintained at Arab Bank in the name of or for the benefit of the following organizations, including but not limited to documents identifying account numbers of such accounts, individuals or entities that opened such accounts, and the deposit of funds into and disbursement of funds out of such accounts; the source of funds deposited into such accounts and the recipients of funds disbursed from such accounts; the identity of Arab Bank employees with knowledge of such accounts; and all correspondence between Arab Bank and such organization:

- a. Palestinian Islamic Jihad;
- b. Popular Front for the Liberation of Palestine;
- c. Al Aqsa Martyrs Brigade;
- d. Fatah/Tanzim;
- e. Force 17;
- f. Fatah Hawks;
- g. Ahmad Abu al-Rish Brigades; and
- h. Palestinian Authority Institute for the Care of Martyrs' Families and the Injured.

RESPONSE TO REQUEST NO 26:

Arab Bank objects to Request No. 26 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 8 organizations for which Plaintiffs are requesting information, only 6 are referenced in the Complaints and only 2 are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 26 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank's knowledge because it calls for all documents concerning accounts maintained at Arab Bank "for the benefit of" the listed organizations without identifying the persons who allegedly opened or maintained the accounts. Arab Bank further objects to Request No. 26 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and

criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to accounts opened or maintained at Arab Bank by the organizations identified in the Complaints.

REQUEST NO 27:

All Documents concerning the announcement by Arab Bank on or about October 7, 2000, that it would make donations to Palestinians injured in the Second Intifada.

RESPONSE TO REQUEST NO 27:

Arab Bank objects to Request No. 27 on the grounds that it seeks the production of documents that are not relevant to the claims and defenses in these cases given that the Complaints do not allege any specific connection between the alleged “donations to Palestinians injured in the Second Intifada” and any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 27 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank’s knowledge because it fails to identify the “Palestinians Injured during the Second Intifada” who were the intended recipients of the alleged donations. Arab Bank further objects to Request No. 27 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request.

REQUEST NO 28:

All Documents concerning any pledges or payments by, or on behalf of, Arab Bank, or its employees, to the Fund for Support of the Persistence of the Palestinian People, including a pledge and payment by Arab Bank of approximately \$2,000,000 to that entity.

RESPONSE TO REQUEST NO 28:

Arab Bank objects to the characterization of the alleged “pledge and payment by Arab Bank of approximately \$2,000,000” to the “Fund for Support of the Persistence of the Palestinian People” set forth in Request No. 28. Arab Bank also objects to Request No. 28 on the grounds that it calls for documents that are not relevant to the claims and defenses because the Complaints do not allege any specific connection between Arab Bank’s purported pledge or payment and any of the Incidents. Arab Bank further objects to Request No. 28 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank’s knowledge because it fails to: (1) identify the “employees” who allegedly made “pledges or payments”; or (2) limit the request to conduct within the scope of their employment. Arab Bank further objects to Request No. 28 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are alleged to specifically relate to the Incidents.

REQUEST NO 29:

Documents sufficient to identify any Arab Bank employees with knowledge of any pledge or payment referred to in Request No. 28.

RESPONSE TO REQUEST NO 29:

Arab Bank objects to Request No. 29 on the grounds that it is repetitive of Request No. 28. Arab Bank thus incorporates herein all objections stated in response to Request No. 28. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are alleged to specifically relate to the Incidents.

REQUEST NO 30:

All Documents concerning accounts maintained at Arab Bank in the name of or for the benefit of the Saudi Committee, including but not limited to documents identifying account numbers of such accounts, individuals or entities that opened such accounts, and the deposit of funds into and disbursement of funds out of such accounts; the source of funds deposited into such accounts and the recipients of funds disbursed from such accounts; all correspondence between Arab Bank and the Saudi Committee; all transactions initiated with Arab Bank by Arab National Bank or the Islamic Development Bank or National Commercial Bank on behalf of the Saudi Committee; and the identity of Arab Bank employees with knowledge of such accounts and transactions.

RESPONSE TO REQUEST NO 30:

Arab Bank objects to Request No. 30 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in these cases. In particular, the Request calls for all banking records concerning accounts "in the name of or for the benefit of" the Saudi Committee, regardless of whether that account activity bears any relation to the Incidents. Arab Bank further objects to Request No. 30 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents

that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 31:

All Documents concerning efforts by Arab Bank to aid, implement or administer programs of the Saudi Committee designed to provide payments to the families of individuals, including Palestinians in Israeli custody, Martyrs and Suicide Bombers, killed or injured during the Second Intifada and the identity of Arab Bank employees with knowledge of such efforts.

RESPONSE TO REQUEST NO 31:

Arab Bank objects to the characterization of the alleged "efforts by Arab Bank" related to the purported Saudi Committee programs described in the Request. Arab Bank also objects to Request No. 31 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in these cases. In particular, the Request fails to identify: (1) the individuals in Israeli custody who are described above as "Palestinians"; (2) the assailants, including the alleged "Martyrs" and "Suicide Bombers," who were killed or injured during the "Second Intifada"; or (3) their "families" and thus persons to whom payments were allegedly made. In addition, Arab Bank objects to Request No. 31 on the grounds that the phrase "aid, implement or administer" is vague and ambiguous. Arab Bank also objects to Request No. 31 because the Complaints do not allege that the Saudi Committee committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 31 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and

represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 32:

All Documents concerning efforts by Arab Bank to aid, implement or administer programs of the Al Ansar Society designed to provide payments to the families of individuals, Martyrs and Suicide Bombers, killed or injured during the Second Intifada and the identity of Arab Bank employees with knowledge of such efforts.

RESPONSE TO REQUEST NO 32:

Arab Bank objects to the characterization of the alleged "efforts by Arab Bank" related to the purported Al Ansar Society programs described in the Request. Arab Bank further objects to Request No. 32 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in these cases. In particular, the Request fails to identify: (1) the assailants, including the alleged "Martyrs" and "Suicide Bombers," who were killed or injured during the "Second Intifada"; or (2) their "families" and thus persons to whom payments were allegedly made. Arab Bank also objects to Request No. 32 on the grounds that the phrase "aid, implement or administer" is vague and ambiguous. Additionally, Arab Bank objects to Request No. 32 because the Complaints do not allege that the Al Ansar Society committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 32 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are alleged to specifically relate to the Incidents.

REQUEST NO 33:

All Documents concerning efforts by Arab Bank to aid, implement or administer programs of the Institute for the Care of Martyrs' Families and the Injured designed to provide payments to the families of Palestinian prisoners in Israeli custody and former prisoners or the families of Martyrs and Suicide Bombers, killed or injured prior to or during the Second Intifada and the identity of Arab Bank employees with knowledge of such efforts.

RESPONSE TO REQUEST NO 33:

Arab Bank objects to the characterization of the alleged "efforts by Arab Bank" related to the purported programs of the "Institute for the Care of Martyrs' Families and the Injured" described in the Request. Arab Bank objects to Request No. 33 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in these cases. In particular, the Request fails to identify: (1) the individuals in Israeli custody who are described above as "Palestinian[s]"; (2) the assailants, including the alleged "Martyrs" and "Suicide Bombers," who were killed or injured during the "Second Intifada"; or (3) their "families" and thus the persons to whom payments were allegedly made. In addition, Arab Bank objects to Request No. 33 on the grounds that the phrase "aid, implement or administer" is vague and ambiguous. Arab Bank also objects to Request No. 33 because it fails to identify any specific connection between those alleged assailants or individuals in custody and the actual Incidents. Arab Bank further objects to Request No. 33 because the "Institute for the Care of Martyrs' Families and the Injured" is not referenced in the Complaints, much less much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 33 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2.

REQUEST NO 34:

All Documents concerning listings or databases provided to or maintained by Arab Bank containing the names of Palestinians in Israeli custody, Martyrs, Suicide Bombers or other persons killed or injured during the Second Intifada, the dates and manner of death, payments made to the families of such persons and Arab Bank contacts with the Saudi Committee and/or HAMAS regarding such listings and databases, including, but not limited to, Documents which identify Arab Bank employees with knowledge of such listings and databases.

RESPONSE TO REQUEST NO 34:

Arab Bank objects to Request No. 34 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in these cases. In particular, the Request fails to identify: (1) the individuals in Israeli custody who are described above as "Palestinians"; (2) the assailants, including the alleged "Martyrs" and "Suicide Bombers," who were killed or injured during the "Second Intifada"; (3) their "families" and thus the persons to whom payments were allegedly made; or (4) the individuals related to the Saudi Committee and/or HAMAS who are alleged to have had "contacts" with Arab Bank. Arab Bank also objects to Request No. 34 because it fails to identify any specific connection between those alleged assailants or individuals in custody and the Incidents. Arab Bank further objects to Request No. 34 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are alleged to specifically relate to the Incidents.

REQUEST NO 35:

All Documents concerning Arab Bank's receipt of certifications by the Palestinian Authority provided to families of Palestinians in Israeli custody, Martyrs, Suicide Bombers and/or

other persons killed or injured during the Second Intifada which make such families eligible to receive payments through Arab Bank and receipts issued to such families confirming such payments, including Documents which identify Arab Bank employees with knowledge of such certifications and receipts.

RESPONSE TO REQUEST NO 35:

Arab Bank objects to the characterization of Arab Bank's alleged "receipt of certifications by the Palestinian Authority" as described in Request No. 35. Arab Bank objects to Request No. 35 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in these cases. In particular, the Request fails to identify: (1) the individuals in Israeli custody who are described above as "Palestinians"; (2) the assailants, including the alleged "Martyrs" and "Suicide Bombers," who were killed or injured during the "Second Intifada"; or (3) their "families" and thus the persons who were eligible for payments and/or to whom payments were allegedly made. Arab Bank also objects to Request No. 35 because it fails to identify any specific connection between those alleged assailants or individuals in custody and the actual Incidents. Arab Bank further objects to Request No. 35 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are alleged to specifically relate to the Incidents.

REQUEST NO 36:

Documents evidencing any document retention or destruction policy that you maintained from 1998 to the present.

RESPONSE TO REQUEST NO 36:

Arab Bank objects to Request No. 36 as overly broad because it calls for all Arab Bank document retention and destruction policies without any geographic limitation as to which countries or territories those policies apply. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1. Arab Bank will continue to conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are applicable to the countries in which the Incidents, and the transactions alleged to be related to them, occurred.

REQUEST NO 37:

Documents evidencing any anti-money laundering or anti-terrorism financing policies that you maintained during the Relevant Time Period.

RESPONSE TO REQUEST NO 37:

Arab Bank objects to Request No. 37 as overly broad because it calls for all Arab Bank anti-money laundering and anti-terrorism financing policies without any geographic limitation as to which countries or territories those policies apply. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1. Arab Bank will continue to conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are applicable to the countries in which the Incidents, and the transactions alleged to be related to them, occurred.

REQUEST NO 38:

Documents evidencing any Know Your Customer policies that you maintained during the Relevant Time Period.

RESPONSE TO REQUEST NO 38:

Arab Bank objects to Request No. 38 as overly broad because it calls for all Arab Bank Know Your Customer policies without any geographic limitation as to which countries or

territories those policies apply. Subject to and without waiving the foregoing, Arab Bank is producing the Linde Bates Nos. set forth in Exhibit 1. Arab Bank will continue to conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are applicable to the countries in which the Incidents, and the transactions alleged to be related to them, occurred.

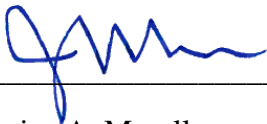
REQUEST NO 39:

All Documents not otherwise requested above that concern the relationship between Arab Bank and the Saudi Committee.

RESPONSE TO REQUEST NO 39:

Arab Bank objects to Request No. 39 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or are disproportionate to the claims and defenses in these cases. Arab Bank also objects to Request No. 39 on the grounds that it is repetitive of previous requests. Arab Bank further objects to Request No. 39 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

Dated: August 23, 2019

By:  _____

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Exhibit 1

**Exhibit 1 to Defendant Arab Bank, plc's Responses and Objections
to Plaintiffs' Second Request for the Production of Documents¹**

Request Number(s)	<i>Linde Bates Range</i>
4, 5, 6, 7, 11, 12, 13, 14, 18, 19, 20, 21, 30, 31, 39	ABPLC006810 - ABPLC006882 ABPLC010553 - ABPLC187051 ABPLC189043 - ABPLC191024 ABPLC196965 - ABPLC198089 ABPLC206382 - ABPLC206483 ABPLC206485 - ABPLC206506 ABPLC209427 - ABPLC211203 ABPLC198090 - ABPLC200300 ABPLC211204 - ABPLC211210 ABPLC211319 - ABPLC211464 ²
36	ABPLC000633 - ABPLC000714 ABPLC000715 - ABPLC000719 ABPLC000720 - ABPLC000734 ABPLC001206 - ABPLC001211 ABPLC001225 ABPLC001226 - ABPLC001236 ABPLC001237 ABPLC001238 - ABPLC001252 ABPLC001491 - ABPLC001502 ABPLC001514 - ABPLC001525 ABPLC001594 - ABPLC001596 ABPLC003634 - ABPLC003635 ABPLC003636 ABPLC003637 ABPLC003638 ABPLC003639 ABPLC003640 - ABPLC003647 ABPLC003648 - ABPLC003650 ABPLC004128 - ABPLC004177 ABPLC004178 - ABPLC004283 ABPLC004284 - ABPLC004505 ABPLC004509 - ABPLC004745 ABPLC004746 - ABPLC004991 ABPLC004992 - ABPLC005229

¹ This chart identifies generally the Requests and the corresponding documents Arab Bank is producing. This is not, however, an exhaustive list in that certain documents may be responsive to more than one Request.

² These Bates Nos. are generally responsive to the Requests calling for Saudi Committee documents. They may also contain records responsive to other Requests relating to banking records concerning particular individuals and entities.

	ABPLC005358 - ABPLC005423 ABPLC005459 - ABPLC005473 ABPLC005474 ABPLC005475 - ABPLC005484 ABPLC005486 - ABPLC005506 ABPLC005526 - ABPLC005542 ABPLC005544 - ABPLC005562 ABPLC005564 - ABPLC005573 ABPLC005575 - ABPLC005589 ABPLC005848 - ABPLC005860 ABPLC005875 - ABPLC005915 ABPLC005923 - ABPLC005929 ABPLC006161 - ABPLC006234 ABPLC006236 - ABPLC006249 ABPLC006250 - ABPLC006281 ABPLC006282 - ABPLC006286 ABPLC006306 - ABPLC006347 ABPLC006358 - ABPLC006371 ABPLC006372 - ABPLC006402 ABPLC203680 - ABPLC203767 ABPLC203772 - ABPLC203830 ABPLC203831 - ABPLC203845 ABPLC203864 - ABPLC203866 ABPLC203975 - ABPLC203978 ABPLC203982 - ABPLC204009 ABPLC204027 - ABPLC204037 ABPLC204038 ABPLC204041 - ABPLC204046 ABPLC204150 - ABPLC204151 ABPLC204353 - ABPLC204548 ABPLC204680 - ABPLC204698 ABPLC204699 - ABPLC204701 ABPLC204774 - ABPLC204785 ABPLC205387 - ABPLC205397 ABPLC205467 - ABPLC205600 ABPLC205606 - ABPLC205666
37	ABPLC000605 - ABPLC000632 ABPLC000633 - ABPLC000714 ABPLC000715 - ABPLC000719 ABPLC000720 - ABPLC000734 ABPLC000735 - ABPLC000799 ABPLC000800 - ABPLC000801 ABPLC000802 - ABPLC000808 ABPLC000809 ABPLC000810 - ABPLC000821 ABPLC000822

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	ABPLC000824
	ABPLC000831
	ABPLC000832 - ABPLC000836
	ABPLC000837 - ABPLC000865
	ABPLC000866 - ABPLC000868
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	ABPLC000879 - ABPLC000887
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	ABPLC001129 - ABPLC001131
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	ABPLC001201 - ABPLC001203
	ABPLC001204
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